

IN THE CIRCUIT COURT
TWENTIETH JUDICIAL CIRCUIT
ST. CLAIR COUNTY, ILLINOIS

TRISHA MAUPIN,

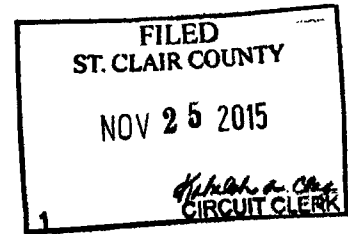
Plaintiff,

vs.

JOHNATHON MICHAEL BEVIL, As Agent
And Employee of Schneider National Carriers and
SCHNEIDER NATIONAL CARRIERS,

Defendant.

Case No. 15-L- 6078



COMPLAINT
COUNT I

Comes now Plaintiff, TRISHA MAUPIN, by her attorney, The Perica Law Firm,
P. C., and for her cause of action against Defendant, JOHNATHON MICHAEL BEVIL, As Agent
for Schneider National Carriers, states as follows:

1. That at all times mentioned herein, Plaintiff, TRISHA MAUPIN, was living at 14073 Travis Lane, in the City of Cairo, County of Alexander, State of Illinois;
2. That on or about December 3, 2013, at approximately 11:39 a.m., Defendant, JOHNATHON MICHAEL BEVIL, As Agent for Schneider National Carriers, was traveling in a northerly direction along and upon I-57, when he hit the automobile in which Plaintiff was a passenger in the rear quarter panel in the County of Pulaski, in the State of Illinois;
3. That on the above date and time, Plaintiff, TRISHA MAUPIN, was exercising ordinary care for her own safety and was a passenger in a vehicle traveling in an northerly direction along and upon I-57, in County Unit Road District Township, County of Pulaski, State of Illinois;
4. That on the above date and time the vehicle that Plaintiff was a passenger in and the

Case No. 15-L- _____
Page 1 of 4

EXHIBIT A

vehicle being driven by Defendant, violently collided causing Plaintiff, TRISHA MAUPIN, injuries as are hereinafter alleged:

5. That on the above date and time, Defendant, JOHNATHON MICHAEL BEVIL, As Agent for Schneider National Carriers, was then and there guilty of one or more of the following negligent acts or omissions:

- a. Failed to reduce his speed to avoid an accident;
- b. Failed to keep his vehicle under control;
- c. Failed to keep a proper lookout for Plaintiff and others traveling upon the roadway;

6. That as a direct and proximate result of Defendant's negligence as above set forth, Plaintiff, TRISHA MAUPIN, was then and there injured in her back and was pregnant at the time of the accident.

7. That Plaintiff was hindered and prevented from attending to her usual duties and affairs;

8. That Plaintiff has in the past and will in the future become liable for large sums of money for hospital and medical treatment in endeavoring to become healed and cured of her injuries;

9. That Plaintiff has in the past and will in the future lose large sums of monies, which would have otherwise accrued to her.

WHEREFORE, Plaintiff, TRISHA MAUPIN, prays for judgment against the Defendant, JOHNATHON MICHAEL BEVIL, As Agent for Schneider National Carriers, for an amount in excess of Fifty Thousand Dollars (\$50,000.00) plus costs of suit.

COUNT II

Comes now Plaintiff, TRISHA MAUPIN, by her attorney, The Perica Law Firm, P. C., and for her cause of action against Defendant, SCHNEIDER NATIONAL CARRIERS, states as follows:

1. That at all times mentioned herein, Plaintiff, TRISHA MAUPIN, was living at 14073 Travis Lane, in the City of Cairo, County of Alexander, State of Illinois;

2. That on or about December 3, 2013, at approximately 11:39 a.m., Defendant's, SCHNEIDER NATIONAL CARRIERS, by and through its agent/employee, Johnathon Michael Bevil, vehicle was traveling in a northerly direction along and upon I-57, when it hit the automobile that Plaintiff was a passenger in in the rear quarter panel in the County of Pulaski, in the State of Illinois;

3. That on the above date and time, Plaintiff, TRISHA MAUPIN, was exercising ordinary care for her own safety and was a passenger in a vehicle traveling in an northerly direction along and upon I-57, in the County of Pulaski, State of Illinois;

4. That on the above date and time the vehicle that Plaintiff was a passenger in and the vehicle being driven by Defendant, violently collided causing Plaintiff, TRISHA MAUPIN, injuries as are hereinafter alleged:

5. That on the above date and time, Defendant, SCHNEIDER NATIONAL CARRIERS, was then and there guilty of one or more of the following negligent acts or omissions:

- a. Failed to reduce its speed to avoid an accident;
- b. Failed to keep its vehicle under control;
- c. Failed to keep a proper lookout for Plaintiff and others traveling upon the roadway;

6. That as a direct and proximate result of Defendant's negligence as above set forth, Plaintiff, TRISHA MAUPIN, was then and there injured in her back and was pregnant at the time of the accident.

7. That Plaintiff was hindered and prevented from attending to her usual duties and affairs;

8. That Plaintiff has in the past and will in the future become liable for large sums of money for hospital and medical treatment in endeavoring to become healed and cured of her injuries;

9. That Plaintiff has in the past and will in the future lose large sums of monies, which would have otherwise accrued to her.

WHEREFORE, Plaintiff, TRISHA MAUPIN, prays for judgment against the Defendant, SCHNEIDER NATIONAL CARRIERS, for an amount in excess of Fifty Thousand Dollars (\$50,000.00) plus costs of suit.

TRISHA MAUPIN, PLAINTIFF,

THE PERICA LAW FIRM, P. C.,

By: 

BOB L. PERICA, #06184457
229 East Ferguson Avenue
Wood River, IL 62095
Telephone: (618) 251-4400
Facsimile: (618) 251-9820
bob@pericalawfirm1.com

IN THE CIRCUIT COURT
TWENTIETH JUDICIAL CIRCUIT
ST. CLAIR COUNTY, ILLINOIS

TRISHA MAUPIN,

Plaintiff,

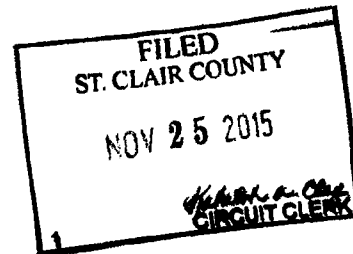
vs.

JOHNATHON MICHAEL BEVIL, As Agent
And Employee of Schneider National Carriers and
SCHNEIDER NATIONAL CARRIERS,

Defendant.

Case No. 15-L-


678



ENTRY OF APPEARANCE

Comes now Bob L. Perica, of The Perica Law Firm, and hereby enters his appearance in the above matter as attorney of record for the Plaintiffs. Copies of all pleadings, notices, and other correspondence should be mailed to the undersigned attorney at the below-stated address.

THE PERICA LAW FIRM, P. C.

By: 

BOB L. PERICA #06184457
229 East Ferguson Avenue
Wood River, IL 62095
Telephone: 618-251-4400
Facsimile: 618-251-9820
bob@pericalawfirm.com

IN THE CIRCUIT COURT
TWENTIETH JUDICIAL CIRCUIT
ST. CLAIR COUNTY, ILLINOIS

TRISHA MAUPIN,

Plaintiff,

vs.

JOHNATHON MICHAEL BEVIL, As Agent
And Employee of Schneider National Carriers and
SCHNEIDER NATIONAL CARRIERS,

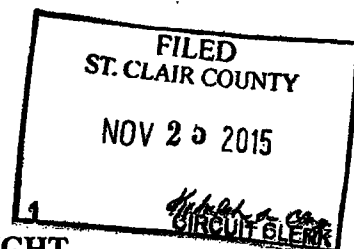
Defendant.

Case No. 15-L-_____

STATE OF ILLINOIS)

) SS

COUNTY OF MADISON)



AFFIDAVIT REGARDING DAMAGES SOUGHT

I, Bob L. Perica, attorney for Plaintiff, hereby state under oath the following:

1. That the total money damages sought in this case exceeds Fifty Thousand Dollars (\$50,000.00).
2. That this Affidavit is pursuant to Supreme Court Rule 222(b).

THE PERICA LAW FIRM, P. C.

By: _____

BOB L. PERICA, #06184457
229 East Ferguson Ave.
Wood River, IL 62095
Telephone: (618) 251-4400
Facsimile: (618) 251-9820
bob@pericalawfirm.com

Subscribed and sworn to before me this 23rd day of Nov., 2015.

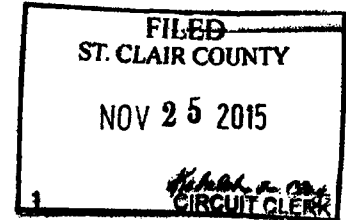


Debra K Davis
Notary Public



BOB L. PERICA ATTORNEY AT LAW

November 23, 2015



Clerk of the Circuit Court
10 Public Square
Belleville, IL 62220

Re: Trisha Maupin v. Johnathon Michael Bevil, As Agent
And Employee of Schneider National Carriers and Schneider
National Carriers
Case No. 15-L- 678

Dear Sir:

Enclosed please find an original and two copies of my Entry of Appearance, Complaint and Affidavit Regarding Damages Sought, which I request that you file.

Please also find a Summons on each defendant in the above matter, which I request that you issue and return to me so that I can arrange for service on the defendants.

I am enclosing my firm's check in the amount of \$268.00 to cover the cost of filing.

Thank you for your assistance in this matter.

Sincerely,

Bob L. Perica

BLP:dd
Enclosures

CIRCUIT COURT FOR THE 20TH JUDICIAL CIRCUIT

State of Illinois)
County of St. Clair) S.S.

Case Number 15-L- 678

Amount Claimed _____

TRISHA MAUPIN

VS

JOHNATHON MICHAEL BEVIL, as Agent
and Employee of Schneider National
Carriers and SCHNEIDER NATIONAL
CARRIERS

Plaintiff(s)

Defendant(s)

Classification Prefix _____ Code _____ Nature of Action _____ Code _____

TO THE SHERIFF: SERVE THIS DEFENDANT AT:

Pltf. Atty. Bob L. Perica Code _____ NAME Schneider National Carriers
Address 229 East Ferguson Ave.
City Wood River, IL 62095 Phone 618-251-4400
Add. Pltf. Atty. n/a Code _____ ADDRESS 3101 S. Packerland Dr

SUMMONS COPY

To the above named defendant(s).....:

CITY & STATE Green Bay, WI 54313

☐ A. You are hereby summoned and required to appear before this court at
(court location) _____ at _____ M. On _____ 20____
to answer the complaint in this case, a copy of which is hereto attached. If you fail to do so, a judgment by default may
be taken against you for the relief asked in the complaint.

☒ B. You are summoned and required to file an answer to the complaint in this case, a copy of which is hereto
attached, or otherwise file your appearance, in the office of the clerk of this court within 30 days after service of this
summons, exclusive of the day of service. If you fail to do so, judgment of decree by default may be taken against you
for the relief prayed in the complaint.

TO THE OFFICER:

This summons must be returned by the officer or other person to whom it was given for service, with
indorsement thereon of service and fees if any, immediately after service. In the event that paragraph A of this
summons is applicable this summons may not be served less than three days before the day of appearance. If service
cannot be made, this summons shall be returned so indorsed.

This summons may not be served later than 30 days after its date.

WITNESS, 12 - 1 - 20 15

KAHALAH A CLAY

Clerk of Court

BY DEPUTY: Wickie Doyle

DATE OF SERVICE: _____ 20____

(To be inserted by officer on copy left with defendant or other person)

SEAL

State of Illinois)
County of St. Clair) S.S.

Case Number

15-L-678

Amount Claimed

TRISHA MAUPIN

VS

JOHNATHON MICHAEL BEVIL, as Agent
and Employee of Schneider National
Carriers and SCHNEIDER NATIONAL
CARRIERS

Plaintiff(s)

Defendant(s)

Classification Prefix _____ Code _____ Nature of Action _____ Code _____

TO THE SHERIFF: SERVE THIS DEFENDANT AT:

Pltf. Atty. Bob L. Perica Code _____ NAME Johnathon Michael Bevil
Address 229 East Ferguson Ave.
City Wood River, IL 62095 Phone 618-251-4400
Add. Pltf. Atty. n/a Code _____ ADDRESS [REDACTED]

SUMMONS COPY

To the above named defendant(s).

CITY & STATE Kings Mountain, NC

☐ A. You are hereby summoned and required to appear before this court at
(court location) _____ at _____ M. On _____ 20____
to answer the complaint in this case, a copy of which is hereto attached. If you fail to do so, a judgment by default may
be taken against you for the relief asked in the complaint.

☒ B. You are summoned and required to file an answer to the complaint in this case, a copy of which is hereto
attached, or otherwise file your appearance, in the office of the clerk of this court within 30 days after service of this
summons, exclusive of the day of service. If you fail to do so, judgment of decree by default may be taken against you
for the relief prayed in the complaint.

TO THE OFFICER:

This summons must be returned by the officer or other person to whom it was given for service, with
indorsement thereon of service and fees if any, immediately after service. In the event that paragraph A of this
summons is applicable this summons may not be served less than three days before the day of appearance. If service
cannot be made, this summons shall be returned so indorsed.

This summons may not be served later than 30 days after its date.

WITNESS, _____

KAHALAH A. CLAY

Clerk of Court

BY DEPUTY: _____

DATE OF SERVICE: _____

20

(To be inserted by officer on copy left with defendant
or other person)

SEAL



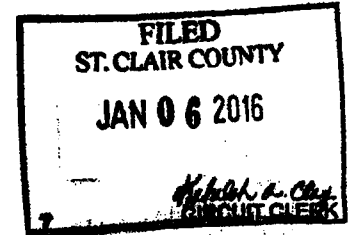


THE PERICA
LAW FIRM, P.C.



BOB L. PERICA ATTORNEY AT LAW

January 4, 2016



Clerk of the Circuit Court
10 Public Square
Belleville, IL 62220

Re: Trisha Maupin v. Johnathon Michael Bevil, As Agent
And Employee of Schneider National Carriers and Schneider
National Carriers
Case No. 15-L-678

Dear Sir:

Enclosed please find the Return of Service showing that proper
service was made on each of the Defendants,

Johnathon Michael Bevil and
Schneider National Carriers,

which I request that you file in the above matter.

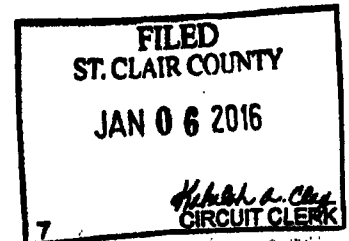
Thank you for your assistance in this matter.

Sincerely,

Bob L. Perica

BLP:dd
Enclosures

IN THE CIRCUIT COURT OF THE
TWENTIETH JUDICIAL CIRCUIT
ST. CLAIR COUNTY, ILLINOIS



TRISHA MAUPIN
Plaintiff,

vs.

Case No. 15-L-678

JOHNATHON MICHAEL BEVIL, As Agent
And Employee of Schneider National Carriers and
SCHNEIDER NATIONAL CARRIERS
Defendant

AFFIDAVIT OF SERVICE – INDIVIDUAL

State of : North Carolina)
County of: Gaston)

Name of Server: JA MOSER, undersigned, being duly sworn, deposes and says that at the time of service, she was over the age of twenty-one, was not a party to this action.

Date/Time of Service: On the 19th day of December 2015, at 10:42 o'clock A. M.

Place of Service: at [REDACTED] city of Kings Mountain county of Cleveland, of NC.

Documents Served: The undersigned served the documents described as: Summons Copy, Entry of Appearance, Complaint and Affidavit Regarding Damages Sought
(Name of document(s))

Person Served, and Method of Service: .

☒ SUB SERVICE for JOHNATHON MICHAEL BEVIL to JESSICA BEVIL, wife at residence

Description of Person: The person receiving documents is described as follows:

Sex F; Skin Color WHITE; Hair Color BROWN; Facial Hair n/a; Approx. Age 28-30
Approx. Height 5'8"; Approx. Weight 200

☒ To the best of my knowledge and belief, said person was not engaged in the U S military at the time of service.

Signature of Server:

Undersigned declares under penalty of perjury that the foregoing is true and correct.

J.A. Moser 12-19th-2015
Signature of Server J.A. Moser (Date)

Subscribed and sworn to before me
this 19th day of December 2015

[Signature]
Notary Public

A Closer Look Investigations, LLC
PO Box 5082
Godfrey, IL 62035
Phone: 618-466-8102

BOBBY S. POOLE, JR.
NOTARY PUBLIC
Gaston County
North Carolina
My Commission Expires: 3-13-2018

Case Number 15-L- 678

Amount Claimed

TRISHA MAUPIN

VS

JOHNATHON MICHAEL BEVIL, as Agent
and Employee of Schneider National
Carriers and SCHNEIDER NATIONAL
CARRIERS

Plaintiff(s)

Defendant(s)

Classification Prefix _____ Code _____ Nature of Action _____ Code _____

TO THE SHERIFF: SERVE THIS DEFENDANT AT:

Pltf. Atty. Bob L. Perica Code _____ NAME Johnathon Michael Bevil
Address 229 East Ferguson Ave.
City Wood River, IL 62095 Phone 618-251-4400
Add. Pltf. Atty. n/a Code _____ ADDRESS [REDACTED]

SUMMONS COPY

To the above named defendant(s).:

CITY & STATE Kings Mountain, NC

☐ A. You are hereby summoned and required to appear before this court at
(court location) _____ at _____ M. On _____ 20____
to answer the complaint in this case, a copy of which is hereto attached. If you fail to do so, a judgment by default may
be taken against you for the relief asked in the complaint.

☐ B. You are summoned and required to file an answer to the complaint in this case, a copy of which is hereto
attached, or otherwise file your appearance, in the office of the clerk of this court within 30 days after service of this
summons, exclusive of the day of service. If you fail to do so, judgment of decree by default may be taken against you
for the relief prayed in the complaint.

TO THE OFFICER:

This summons must be returned by the officer or other person to whom it was given for service, with
indorsement thereon of service and fees if any, immediately after service. In the event that paragraph A of this
summons is applicable this summons may not be served less than three days before the day of appearance. If service
cannot be made, this summons shall be returned so indorsed.

This summons may not be served later than 30 days after its date.

WITNESS, 12-1- 2015
KAHALAH A. CLAY

Clerk of Court

BY DEPUTY: Wanda Dagle

DATE OF SERVICE: _____ 20____
(To be inserted by officer on copy left with defendant
or other person)

SEAL

I certify that I served this summons on defendants as follows:

(a) - (Individual defendants - personal):

By leaving a copy of the summons and a copy of the complaint with each individual defendant personally as follows:

Name of defendant	Date of service
_____	_____
_____	_____
_____	_____
_____	_____

(b) - (Individual defendants - abode):

By leaving a copy of the summons and a copy of the complaint at the usual place of abode of each individual defendant with a person of his family, of the age of 13 years or upwards, informing that person of the contents of the summons, and also by sending a copy of the summons and of the complaint in a sealed envelope with postage fully prepaid, addressed to each individual defendant at his usual place of abode, as follows:

Name of defendant	Person with whom left	Date of service	Date of mailing
Johnathon Michael Bevil	Jessica Bevil	12-19-2015 10:42 AM	
_____	_____	_____	_____
_____	_____	_____	_____

(c) - Corporation defendants):

By leaving a copy of the summons and a copy of the complaint with the registered agent office, or agent of each defendant corporation as follows:

Defendant corporation	Registered agent, officer or agent	Date of service
_____	_____	_____
_____	_____	_____
_____	_____	_____

(d) - (Other service):

JA Moser JA Moser, Private Process Server
of Gaston County, N. Carolina

_____, Sheriff of _____ County
_____, Deputy

SHERIFF'S FEES

Service and return _____ \$
Miles _____ \$
Total _____ \$

Sheriff of _____ County

RETURN OF SERVICE

State of Illinois

County of Saint Clair

20th Judicial Circuit Court

Case Number: 15-L-678

Plaintiff:

Trisha Maupin

vs.

Defendant:

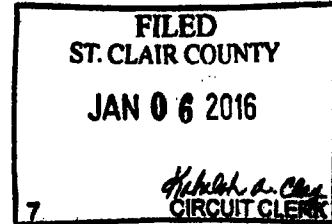
**Johnathon Michael Bevil, as Agent and Employee of Schneider
National Carriers and SCHNEIDER NATIONAL CARRIERS**

For:

A Closer Look Investigations, LLC

Po Box 5082

Godfrey, IL 62035




Received by Clutter Investigations Inc. DBA Courthouse Courier on the 18th day of December, 2015 at 2:53 pm to be served on **Schneider National Carriers, Inc. c/o The Corporation Company, 118 West Edwards Street, Suite 200, Springfield, IL 62704.**

I, Kaitlynn Lauterbach, do hereby affirm that on the **22nd day of December, 2015 at 3:27 pm, I:**

served a **CORPORATION** by delivering a true copy of the **Summons Copy, Entry of Appearance, Complaint, and Affidavit Regarding Damages Sought** with the date and hour of service endorsed thereon by me, to: **Melanie Robinson as Fulfillment Specialist for Schneider National Carriers, Inc., at the address of: 118 West Edwards Street, Suite 200, Springfield, IL 62704,** and informed said person of the contents therein, in compliance with all applicable law.

Description of Person Served: Age: 45, Sex: F, Race/Skin Color: White, Height: 5'8", Weight: 160, Hair: Brown, Glasses: N

I being first duly sworn on oath, states that I am over 18 years of age and not a party to this lawsuit. Under penalties of perjury as provided by law, pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the above statement is true and correct.


Kaitlynn Lauterbach
129-391250

**Clutter Investigations Inc. DBA Courthouse Courier
1032 S. 2nd Street
Springfield, IL 62704
(217) 528-5997**

Our Job Serial Number: CLU-2015004155

State of Illinois)
County of St. Clair) S.S.

Case Number 15-L- 678

Amount Claimed _____

TRISHA MAUPIN

VS

JOHNATHON MICHAEL BEVIL, as Agent
and Employee of Schneider National
Carriers and SCHNEIDER NATIONAL
CARRIERS

Plaintiff(s)

Defendant(s)

Classification Prefix _____ Code _____ Nature of Action _____ Code _____

TO THE SHERIFF: SERVE THIS DEFENDANT AT:

Pltf. Atty. Bob L. Perica Code _____ NAME Schneider National Carriers
Address 229 East Ferguson Ave.
City Wood River, IL 62095 Phone 618-251-4400
Add. Pltf. Atty. n/a Code _____ ADDRESS 3101 S. Packerland Dr

SUMMONS COPY

To the above named defendant(s).....:

CITY & STATE Green Bay, WI 54313

☐ A. You are hereby summoned and required to appear before this court at
(court location) _____ at _____ M. On _____ 20____
to answer the complaint in this case, a copy of which is hereto attached. If you fail to do so, a judgment by default may
be taken against you for the relief asked in the complaint.

☐ B. You are summoned and required to file an answer to the complaint in this case, a copy of which is hereto
attached, or otherwise file your appearance, in the office of the clerk of this court within 30 days after service of this
summons, exclusive of the day of service. If you fail to do so, judgment of decree by default may be taken against you
for the relief prayed in the complaint.

TO THE OFFICER:

This summons must be returned by the officer or other person to whom it was given for service, with
indorsement thereon of service and fees if any, immediately after service. In the event that paragraph A of this
summons is applicable this summons may not be served less than three days before the day of appearance. If service
cannot be made, this summons shall be returned so indorsed.

This summons may not be served later than 30 days after its date.

WITNESS, KAHALAH A. CLAY 12-1- 20 15

BY DEPUTY: Wickie Doyle**SEAL**

DATE OF SERVICE: December 22 20 15
(To be inserted by officer on copy left with defendant
or other person)

I certify that I served this summons on defendants as follows:

(a) - (Individual defendants - personal):

By leaving a copy of the summons and a copy of the complaint with each individual defendant personally as follows:

Name of defendant	Date of service
_____	_____
_____	_____
_____	_____
_____	_____

(b) - (Individual defendants - abode):

By leaving a copy of the summons and a copy of the complaint at the usual place of abode of each individual defendant with a person of his family, of the age of 13 years or upwards, informing that person of the contents of the summons, and also by sending a copy of the summons and of the complaint in a sealed envelope with postage fully prepaid, addressed to each individual defendant at his usual place of abode, as follows:

Name of defendant	Person with whom left	Date of service	Date of mailing
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

(c) - Corporation defendants:

By leaving a copy of the summons and a copy of the complaint with the registered agent office, or agent of each defendant corporation as follows:

Defendant corporation	Registered agent, officer or agent	Date of service
<u>Schneider National</u>	<u>Melanie Robinson</u>	<u>12/22/2015</u>
<u>Carriers, Inc.</u>	_____	_____
_____	_____	_____

(d) - (Other service):

SHERIFF'S FEES	
Service and return	\$ _____
Miles	\$ _____
Total	\$ _____
Sheriff of _____ County	

Kathryn Lauterbach, Sheriff of Sangamon County
Kathryn Lauterbach, Deputy
 Process Server